APPENDIX D
COMMENTS AND RESPONSES

Comments are not listed in their entirety; portions of comments that appear to state an issue are presented below. For the full text of comments, please contact the New Mexico State Office.

Mark Belles, Rowlett, TX 75088, received 5/6/04	
1a Fire Management Categories and Units: Appendix A clearly states the standards for categorizing lands as FMU A, B, C, or D. However, no explanation is given to identify what features are present in each unit to justify the FMU classifications. In order to assess the appropriateness of the classifications of each unit, the rationale for each unit should be presented.	**Response:** The Fire Management Units (FMUs) were developed by each Field Office in their Fire Management Plans (FMPs), which are now being revised. The Fire and Fuels Management Plan Amendment provides guidance and criteria for subsequent development of FMPs. The FMP establish the FMUs and provide detailed descriptions of the resources and fire regimes in those units, as well as the rationale for their development. To fully understand why and how the FMUs were established, one must review the Fire Management Plans. FMPs can be reviewed at individual Field Offices.
1b Wildland Fire Use: I'm concerned that only 23% of the lands under consideration were classified as FMU "D". At first glance this seems much too small. Without understanding the rationale behind the classification of each unit there really isn't a basis for an opinion, but I have difficulty accepting the assertion [that] 72% of the lands under consideration require "significant constraints that must be considered for [wildland fire] use."	**Response:** There are many areas of BLM land in New Mexico that are in Category B or C, but would probably be placed in Category D, if viewed strictly from a natural resources perspective. These are lands on which fire is generally considered beneficial and there are few constraints on allowing fire to burn under natural conditions. However, when adding the human dimension, where communities, community infrastructure, oil fields, utility corridors, roads and highways, etc, are interspersed on the land, our ability to allow fires to burn under natural conditions is severely limited. Therefore, large areas of land are placed in Category B and C due to human concerns, when these lands would otherwise be placed in Category D.

Paula Ward and Bruce Ward, Co-Executive Directors, Continental Divide Trail Alliance, Pine, CO 80470, received 5/20/04	
Recreation, Roads: While the Continental Divide Trail Association (CDTA) recognizes the importance of healthy forests and hazardous fuels reduction, we request the [BLM] take serious consideration of how this work may negatively impact the experience on the Continental Divide National Scenic Trail (CDNST). The CDTA is especially concerned about the development of roads in the area to execute this proposal, and the degradation of significant features critical to the National Scenic Trail experience. Please consider the following comments when considering proposals within close proximity to the Continental Divide National Scenic Trail: 1. It is the intention of Congress for the CDNST to be a primitive and challenging non-motorized trail traversing the Continental Divide from Canada to Mexico. According to the National Trails System Act, the CDNST is intended for foot and horse travel and should not be open to motorized use except in very limited circumstances. 2. New CDNST construction should link to existing non-motorized segments of trail, or a plan should be in place to address the motorized uses on either end in the near future in order to meet the intent of the CDNST as a non-motorized trail. 3. To avoid building trail that may not fit National Scenic Trail standards, and to improve the overall planning of the CDNST, we suggest all agencies: • Review the existing or proposed CDNST route in the adjacent jurisdictions to assure it meets National Scenic Trail standards prior to connecting with them. • Establish CDNST "control points" where the Trail must pass through and analyze route opportunities between these points that fit National Scenic Trail standards. 4. All agencies should plan, manage and construct the CDNST to include the following characteristics: • Built to a non-motorized standard--Fully accessible for foot and equestrian use. Portions accessible for mountain bikes where appropriate. • Challenging--Requiring a need for self-	**Response:** The actions proposed in the Fire and Fuels Management Plan/Environmental Assessment (EA) will have no direct or indirect effect on the location, construction, or management of the Continental Divide National Scenic Trail. All Field Offices in New Mexico will develop Fire Management Plans based on the plan amendment/EA, including those Field Offices through which the trail passes. Fire suppression and management actions relating to the trail that will be incorporated into those plans will include prohibiting motorized equipment on those parts of the trail which were not already open to motorized vehicles. In primitive and undeveloped areas, soil disturbing activities such as blading fire lines along or parallel to the trail will be prohibited. Other trail protective measures may also be developed during the preparation of site specific project plans for fuels treatments.

reliance and back-country skills. • Located through the most primitive, diverse and undeveloped landscapes on or near the Continental Divide. • Accesses or is routed near nationally significant scenic, historic, cultural and natural features. • Allows for an opportunity to view dramatic or unique scenery. • Allows for an opportunity to view wildlife. • Provides appropriate access to water sources. • Developed to the most simple, yet high quality standard.	
COMMENTS FROM FEDERAL AGENCIES, STATE AGENCIES AND TRIBES	
3 Lisa Kirkpatrick, Chief, Conservation Services Division, New Mexico Department of Game and Fish, One Wildlife Way, PO Box 25114, Santa Fe, NM 87504, received 5/21/04	
3a Alternatives: BLM has limited management options by specifying certain percentages associated with each treatment method (i.e., proposed alternative: 40% mechanical, 40% prescribed fire, 20% chemical). The application of percentages appears to be used as a method of differentiating between the alternatives. However, the application of percentages may limit the ability of BLM to meet stated treatment goals on both a short or long-term basis.	**Response:** The use of percentages to define a range of treatments does not limit the BLM since a combination of any fuels management technique on any fuel type would be used. The limitations are budget, climate, resource availability, or specific environmental conditions. The alternatives listed are a substantial potential increase over the current action.
3b Wildland Fire Use: The alternatives fail to consider wildland fire use as an integral part of the stated treatment goal percentages and this term is not addressed in the glossary.	**Response:** The term wildland fire use has been added to the glossary. Wildland Fire Use is an integral part of the stated treatment goals. FMU category D designation comprises 23 percent of the total. See Table 2.1, 2.2 and page 2.5 for a discussion of wildland fire use in the Proposed Action.
3c Wildland Fire Use: On page 2-15, it is clearly stated that [wildland fire use] is not a viable management option until a Fire management Plan is developed and approved by each field office and yet the strategy for wildland fire use is addressed in Table 2.1.	**Response:** On Page 2-15, the paragraph discussing Wildland Fire Use for Resource Benefit has been clarified. Through BLM guidance, and in compliance with the Federal Wildland Fire Policy of 1995, BLM is required to have approved Fire Management Plans in place prior to initiation of Wildland Fire Use fires. However, once the proper planning, analysis, and preparation is completed, Wildland Fire Use is a viable option on many lands in Categories C and D.

3d Wildland Fire Use: In Chapter 4, a discussion of wildland fire use is absent from the analysis for the proposed alternative. As such the EA does not meet CEQ requirement 1502.16 for analysis of environmental consequences.	**Response:** Changes have been made in Chapter 4 to ensure that wildland fire use is analyzed as part of the Proposed Action. The Proposed Action is defined to include wildland fire use in Chapter 2 in Table 2.1 and page 2.3. The environmental consequences of wildland fire use are expected to be similar to those of prescribed fire and are combined with prescribed fire in the descriptions of the Proposed Action, Mechanical Emphasis Alternative, and Fire Emphasis Alternative environmental consequences.
3e Wildland Fire Use: The Department has observed, through the implementation of prescribed fires, funded by the Habitat Stamp Program that frequently, prescribed fires do not produce the results necessary to meet wildlife resource objectives. In general, the prescribed fires are too "cool" and do not modify woody vegetation to the extent necessary for maximum wildlife benefit. It is also the Department's position that wildland fire use will become a more valuable management tool as treated acres are allowed to return to natural fire regimes. A higher level of commitment to wildland fire use should be presented throughout the text of this document.	**Response:** BLM concurs that in some areas fires need to burn under relatively extreme conditions in order to meet resource objectives, and some areas need extensive acreages burned to return fire to its natural role on a landscape level. As the BLM fire management program matures, we develop more expertise in managing fire, we gain a better understanding of fire ecology, and the public becomes more accepting of fire on the landscape, we are confident that the BLM will demonstrate the "higher level of commitment to wildland fire use" that the writer would like to see. We presently develop specific prescribed fire and wildland fire use prescriptions to meet resource objectives; prescriptions include weather parameters and expected fire behavior. We identify a range of weather parameters including a cool, hot, and desired range of acceptable weather variables. As an example, the resource objective of the recent Big Hatchet Burn in the Las Cruces Field Office was to improve bighorn sheep habitat by decreasing predator cover and increasing browse vegetation. The prescription was site specific and the weather parameters started at a higher temperature range and lower relative humidity (69-90 degrees and 10-40 percent) than for other fires; for example, for burning slash piles to reduce fire danger in the Timberon Burn (10-60 degrees and 25-75 percent). Many of our burns have multiple resource objectives. We develop a prescription that best meets all of them. In some cases, this means burning during several burn windows at different times of the year.

4 Alan Schroeder, Natural Resource Specialist, , Bureau of Reclamation, Western Colorado Area Office, 2764 Compass Drive, Suite 106, Grand Junction, CO 81506 (Cooperating Agency), received 5/25/04	
4a Alternatives: Overall, [the document] looks good. WCAO supports the staff's recommendations of the Maximum Flexibility [Multiple Treatment] Alternative as the preferred alternative. We look forward to working with the Farmington Field Office to coordinate fire and fuels management adjacent to Navajo Reservoir.	**Response:** Comment noted.
4b Wildland Urban Interface (WUI): Probably should define "wildland urban interface" either in the glossary or the narrative.	**Response:** The term has been added to the glossary.
4c Continuity and consistent use of terms: Ensure continuity and consistent use of terms and ties to terms used. (Example - the SW and Plains Forested/Shrub Wetland plant community is listed in table 3.2 and identified as a riparian community on page 3-17, but is not specifically mentioned as such in the riparian description on page 3-20, and is not included in Table 3-4.)	**Response:** Comment noted. The document has been reviewed with continuity and consistency of terms in mind, and the above example has been edited to be more consistent.
4d Fire Regimes: Page 3-27, Table 3.4 Fire Regimes for NM/TX Plant Communities: Was there any particular reason that the SW and Plains Forested/Shrub Wetland plant community was not included in this table, while tamarisk (which was not previously listed as a separate plant community) was included?	**Response:** Document has been changed to reflect comment.
4e Noxious Weeds: Page 3-29, Table 3.5 NM Noxious Weed List, Class A, row 8 beginning with "Eurasian": shift "watermilfoil" from the second cell to the first cell in the row so the common name reads "Eurasian watermilfoil."	**Response:** Change has been made.
4f Noxious Weeds: Page 3-29, Table 3.5 NM Noxious Weed List, Class C, row 2 beginning with "Jointed": shift "goatgrass" from the second cell to the first cell in the row so the common name reads "Jointed goatgrass."	**Response:** Change has been made.
4g Minerals: Page 3-45: Suggest the subsequent explanatory paragraphs follow the same sequence as the last sentence in paragraph 1 - locatable, leasable, and salable. Also, you may want to better define these terms: Locatable - subject to location under the mining laws; leasable - subject to leasing pursuant to the Mineral Leasing Act; salable - common varieties of mineral materials subject to use authorization through sale or permit. Note: Some *uncommon* varieties of mineral	**Response:** Suggested changes have been made.

materials (such as, high quality or unique quarry rock or building stone) may be considered "locatable" minerals.	
4i Correction in Agency Name: Page 5-1, paragraph 5 (BOR MOU): Insert the word "Area" between the words "Colorado" and "Office".	**Response:** Change has been made.
5 John R. Welch, PhD, Archaeologist and Historic Preservation Officer, White Mountain Apache Tribe Heritage Program, PO Box 507, Fort Apache, AZ 85926, received 5/19/04	
5a Restore fire's place in the ecosystem: Fire management planning must fully address the future of fire management in terms of the enormous historical impacts and still-unfolding consequences of fire management. The past century of fire management--characterized by manipulating and fighting natural ecosystem processes--has by all accounts failed. Tribes and other, less directly affected citizens will likely continue to pay the dear prices associated with these misguided programs and policies unless and until we establish forestry and fire and fuels programs and policies that work in concert with natural processes.	**Response:** Comment noted.
5b Cultural Resources: As regards Cultural Heritage Resources, fire has been the # 1 source of damage and loss. Wildland and prescribed fires have claimed thousands and thousands of sites and objects containing fire-sensitive elements. Among the Cultural Heritage Resources (CHRs) known to have been seriously impacted by fire and fire management are: caves, springs, plant and mineral gathering areas, cliff dwellings, Apache gowa (wickiups), diverse wood and brush structures, culturally modified trees, graves and grave markers, and Historic buildings. We use the term CHRs to refer to sacred, cultural, archaeological, and historical sites and objects, including plants and animals, fossils, paleontological localities, landscapes, and other sites, objects and knowledge.	**Response:** Comment noted.
5c Cultural Resources: General concerns/issues and recommendations: Apache and other Native cultural principles should be given parity with technical concepts as a source of crucial guidance for managing fuels and fire in Indian Country and, at least as importantly, communicating with interested Tribes and the public.	**Response:** We hope that Native American Tribes consulted in the planning process for fuel reduction projects will provide Tribal input and recommendations for treatment options. Tribal input will be requested during tribal consultation required by the National Historic Preservation Act and NEPA. The NEPA process also gives the public an opportunity to comment (see Chapter 2, Table 2.7, page 2-13).

5d Cultural Resources: General concerns/issues and recommendations: All prescribed fire and fuels management projects need to include %100 CHR site identification and documentation inventories early in the planning efforts. Prescribed natural fire plans should, at a minimum, require sample surveys.	**Response:** Our intent is to require Class III (100%) level inventory in landscapes where moderate to high densities of vulnerable cultural resource sites are expected to occur, and to tailor the level of sample inventory to identify these areas. Conducting 100% inventory on all areas regardless of the level of potential conflict would prove prohibitively expensive and in many areas produce limited results. Due to the high site densities in many parts of the state, however, Class III level inventory will often be required. Wildland fire use and prescribed fire plans will generally use existing cultural resource data to identify potential conflicts; where information is limited sample inventory will be conducted to identify cultural resources prior to prescribed fire projects (see page 4-10).
5e Alternatives: The planning process should focus on maintenance and restoration of landscapes. Choosing not to do anything is a valid and increasingly appropriate form of management, and we are surprised that this alternative is not analyzed in the EA.	**Response:** The writer appears to want us to analyze the alternative of "not doing anything." A "not doing anything" alternative indicates we would take no suppression action on wildfires and do no fuels treatments. This would differ from the "no action" alternative. "No action" indicates we would continue with the program that currently exists. A "not doing anything" alternative was not considered and would be dismissed from further consideration, since we have a legal responsibility to protect the public from the danger of wildfire, and we have a mandate to protect natural and cultural resources from damage from unwanted wildfire. If the writer intended the "not doing anything" alternative to mean that we should allow fire to function in its natural role in the ecosystem, this concept is being addressed in the Proposed Action, and would be utilized wherever possible. Detailed analysis of where fire can be allowed to function in its natural role is contained in the individual Fire Management Plans (available at Field Offices). Category D areas on Fire Management Unit maps in Appendix A.6 are areas where fire could be allowed to function in its natural role in ecosystems.
5f Wildland Fire Use: Prescribed Natural Fire and adaptive management alternatives and strategies deserve detailed and consistent consideration as management tools available to achieve objectives.	**Response:** Prescribed Natural Fire is referred to as "wildland fire use" in the document. The Proposed Action identifies wildland fire use as a fire management option on over 23 percent of BLM lands. Wildland fire use is proposed in all alternatives except the "No Action" Alternative; prescribed fire is proposed in all alternatives. We agree that adaptive management is critical in learning how to manage fire on specific landscapes; adaptive management strategies are outlined in Appendix A.5.

5g Prescribed Fire: Seasonality of prescribed fire deserves similar consideration.	**Response:** Seasonality of prescribed fire is addressed on page 2-15 and 4-8. At the project level, individual burn plans will specify the tolerable prescription window that will determine the seasonality of prescribed fire.
5h Chemical Treatments: We do not favor and would urge reconsideration of the use of chemical treatments on the grounds of Apache cultural principles calling for treatment of the Earth as a relative and because we find no evidence of adequate understanding of the indirect and cumulative effects of herbicide treatments.	**Response:** The use of chemicals, specifically herbicides, is one of many tools to change vegetation structure on BLM land and may be the only possible treatment on some sites. The BLM only uses EPA approved herbicides and must follow procedures outlined in several handbooks. Nineteen different herbicides were approved for use in previous Records of Decisions within the western BLM public land. The public would have the opportunity to provide comments opposing herbicide use as part of the NEPA process for individual projects.
5i Tribal Consultation: Finally, although the Tribe generally chooses not to participate in consultation relating to projects in New Mexico, please keep us fully informed concerning any project or proposal involving any site with known or suspected Apache cultural affiliations.	**Response:** As requested, BLM will consult with the White Mountain Apache Tribe on any project or proposal involving any site with known or suspected Apache cultural affiliations.